

Monte J. White and Associates
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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
WICHITA FALLS DIVISION

IN RE:	§
Tonya DeAnn Campbell	§ Case No. 12-70485-HdH-13
	§
DEBTOR	§

DEBTOR'S RESPONSE TO MOTION FOR RELIEF FROM
AUTOMATIC STAY OF Midfirst Bank

TO THE HONORABLE JUDGE OF SAID COURT:

Comes now Debtor in the above-titled cause and files this Response to Motion for Relief from Automatic Stay.

On January 23, 2014, Attorney for Midfirst Bank, Barrett Daffin Frappier Turner & Engel, LLP, filed a Motion for Relief from Automatic Stay, in response thereto, Debtor would show the following:

1. ADMIT
2. ADMIT
3. ADMIT
4. ADMIT
5. DENY
6. DENY
7. DENY
8. DENY
9. DENY
10. DENY
11. DENY

WHEREFORE, PREMISES CONSIDERED, Debtor prays that motion be denied in all respects, that the Court award reasonable and necessary attorney fees for the defense of this Motion and for such other and further relief to which they may be entitled.

Respectfully submitted,

/s/Monte J. White
Attorney for Debtor

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Response to Motions for Relief from Stay was served by ECF and/or mailed on January 27, 2014, to the following as indicated:

/s/Monte J. White
Attorney for Debtor

Movant:	Midfirst Bank Attention: Bankruptcy PO Box 26648 Oklahoma City, OK 73216
Attorney for Movant:	Barrett Daffin Frappier Turner & Engel, LLP 15000 Surveyor Blvd, Suite 100 Addison, Texas 75001
Trustee:	Chapter 13 Trustee Walter O'Cheskey 6308 Iola Ave. Lubbock, TX 79424
	U.S. Trustee William T. Neary 1100 Commerce Street, Room 9-C-60 Dallas, TX 75242
Debtor:	Tonya DeAnn Campbell 4 Rock Island Wichita Falls, TX 76308